

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**MOBILE MED WORK HEALTH
SOLUTIONS, INC.;**
JLL VENTURES, INC.; and
M-M WHS LLC,

Plaintiffs

V.

JOSHUA MOORE; CORY RODRIGUEZ; NFN8 GROUP, INC.; NFN8 HOLDINGS, LLC; NFN8 CAPITAL, LLC; NFN8 MEDIA, LLC; NFN8 FOUNDATION; and CRYPTOTECH HOLDINGS, LLC,

Defendants

[illegible]

CASE NO. AU:24-CV-01219-RP

THE PARTIES' JOINT MOTION TO EXTEND DEADLINES

Plaintiffs Mobile Med Work Health Solutions, Inc. (“Mobile Med”), JLL Ventures, Inc. (“JLL”), and M-M WHS LLC (“M-M WHS”) (collectively, “Plaintiffs”) and Defendants Joshua Moore, Cory Rodriguez, NFN8 Group, Inc., NFN8 Holdings, LLC, NFNA8 Capital, LLC, NFN8 Media, LLC, NFN8 Foundation, and Cryptotech Holdings, LLC (collectively, “Defendants”) respectfully submit the following Joint Motion to Extend Deadlines.

REQUEST FOR EXTENSION

1. On December 12, 2024, the Court entered an Order granting Defendants’ Motion to Compel, and Granting in Part Plaintiffs’ Motion to Compel Discovery. [Dkt. 51]. The Court’s Order requires both parties to produce additional documents and allows Plaintiffs to take additional deposition time with Defendant Joshua Moore and NFN8 Controller Fernando Jaimes.

2. In its Order, the Court recognized that the expanded discovery may impact Plaintiffs' December 13, 2024 deadline to file a Motion for a Preliminary Injunction. The Court indicated its willingness to consider a motion to extend that deadline and encouraged the Parties to "confer and present to the Court a joint proposed briefing schedule."

3. Having conferred according to the Court's instruction, and in light of the impending holidays, the parties present the following proposed discovery and briefing schedule:

EVENT	DEADLINE
Deadline for both Parties to produce documents per the Order	December 27, 2024
Deadline for additional depositions, per the Order, to be completed remotely	January 15, 2025
Deadline for Plaintiffs' Motion for Preliminary Injunction	January 24, 2025
Deadline for Defendants' Response to Preliminary Injunction	February 14, 2025
Deadline for Plaintiffs' Reply in Support of Preliminary Injunction	February 21, 2025

4. In addition to the above deadlines, the parties propose that the deadline for Defendants to answer or otherwise respond to the Complaint be extended until 14 days after the resolution of Defendants' Motion to Compel Arbitration.

CONCLUSION

The Parties respectfully request that this Court enter an Order granting this Joint Motion and extend the briefing deadlines as requested.

Date: December 13, 2024

Respectfully submitted,

Step toe LLP

/s/ David Isaak

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CERTIFICATE OF SERVICE

I certify that on December 13, 2024, a true and correct copy of the foregoing document has been served on all counsel of record by electronic mail.

/s/ David Isaak

David Isaak